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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION  
2012 JUN 22 PM 3:41

CLERK'S OFFICE  
U.S. DISTRICT COURT  
WD OF TN, MEMPHIS

Mrs. Shelbi L. Sellers

(Name of plaintiff or plaintiffs)

CIVIL ACTION NO. \_\_\_\_\_

Estee Lauder  
Macy's Department Store

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Shelbi L. Sellers  
(name of plaintiff)

is a citizen of the United States and resides at 3636 Outland Dr.  
(street address)

Memphis  
(city)

(country)

TN  
(state)

38118  
(zip code)

901) 277-1224  
(telephone number)

3. Defendant

Estee Lauder (Macy's)  
(defendant's name)  
lives at, or its business is located at 4545 Poplar Ave,  
(street address)  
Memphis TN. 38111

4. Plaintiff sought employment from the defendant or was employed by the defendant at

4545 Poplar Ave,  
(street address)  
Memphis (city) U.S. (country) TN (state) 38118 (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about

(day) 04 (month) 07 (year) 2011

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 02 11 2011  
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 02 11 2011  
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 204 04 2012. (Attach a copy of the notice to this complaint.)

9. Because of plaintiff's (1)  race, (2)  color, (3)  sex, (4)  religion, (5)  national origin, defendant

(a)  failed to employ plaintiff.

(b)  terminated plaintiff's employment.

(c)  failed to promote plaintiff.

(d) \_\_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows: *After MANY attempts of gaining a full-time position with Estee Lauder at Macys, I was denied and beaten, our only being told that if (the position) was not available, application was returned back to me by my Supervisor & 2 White American Women were hired instead with no experience as I was a senior already maintaining the responsibilities and duties as well as the know how for this position.*

*I was also hired to a Stockroom where I was cursed at and harassed by another Supervisor of Estee Lauder of something that was so minute and disturbing so much so that I had to begin to see a Stress ~~Therapist~~ Counselor. One of the managers came forward and confessed to me that she was told to harass & get rid of me 2 days before she resigned.*

11. The acts set forth in paragraph 9 of this complaint

- (a)  are still being committed by defendant.
- (b)  are no longer being committed by defendant.
- (c)  may still be being committed by defendant.

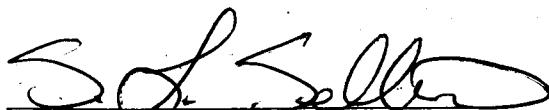
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a)  Defendant be directed to employ plaintiff, or
- (b)  Defendant be directed to re-employ plaintiff, or
- (c)  Defendant be directed to promote plaintiff, or;
- (d)  Defendant be directed to *a settlement of financial restitution and to reinstate opportunity of employment of the benefits originally requested and applied for.*

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes  No

  
SIGNATURE OF PLAINTIFF